

1/29/98

Ms Mary L. Cottrell  
Secretary  
Department of Public Utilities  
Leverett Saltonstall Building  
100 Cambridge Street - Room 1210  
Boston, MA 02202

Re: Comments on ORDER PROPOSING REGULATIONS AND SOLICITING COMMENT  
(220 C.M.R.)

Dear Ms Cottrell:

The General Services Administration - New England Region submits the following comments in response to the above referenced document.

- 1) 11.02, In the definition of "Renewable Resources", the term "naturally flowing water" remains unclear. Can you provide a further definition ?
- 2) 11.03 (3)(d), When does the department anticipate making the determination on inclusion of an exit fee?
- 3) 11.04 (9)(b)3, The Distribution Company proposes a \$/kWh for each of the seven years that Standard Offer will be available, and these prices can then only escalate, in any given year, by the rate of inflation.

Is this scenario correct? If the Distribution Companies are required to submit a summary page detailing their standard offer pricing for each rate class it will greatly simplify the competitive process for consumers.

- 4) 11.04 (9)(b)2.(d), Define "small" in "small commercial and industrial customer".
  - 1) 11.04 (10)(f), Concerning the issue of security deposits; it is unclear to us what "as appropriate" refers to. For example, will this security deposit be allowed per customer, per account, refundable at any time, or placed in escrow? Is this intended for all customers or certain customers at the company's discretion?
- 6) 11.04(12), The model terms and conditions allow for monthly energy consumption and peak demand but not the actual interval data ( 15 minute load data) for demand customers. The Distribution Companies have this information for their demand customers. This interval data is the best way to represent the load profile for a facility, thus facilitate maximum competition. We feel this should also be made available, at no cost or a minimal cost, to customers to facilitate decisions during the proposal and negotiation stages of competitive purchases.

Please define further what may be considered a fair and reasonable price for this information to the customer. We have been quoted prices from Distribution Companies that range from no charge, to a few dollars, to \$1,000 per account.

Please define further how long a response time can be expected when using the term “in a timely manner”. Every day without competition costs the consumer more dollars.

Thank you for the opportunity to respond. If you would like to discuss any of these issues further, call Roman Piaskoski at (617) 565-4693 or Karen Curran at (617) 565-4690. Please acknowledge receipt of twelve copies of our comments.

Sincerely,

Karen Curran

Roman Piaskoski  
General Services Administration  
New England - Property Management